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September 27, 2021

Via Electronic Filing
Hon. Colleen McMahon
Chief, U.S. District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: U.S. v. Jabron Green, et al., S2 19 cr 496-02 (CM)

Dear Chief Judge McMahon:

I represent Jabron Green in the above-referenced matter. I request a bail modification to allow Mr. Green and his wife to visit with their son Jalin Sinclair on Saturday, October 2, 2021, from 9:00 a.m. – 9:00 p.m. at Lehigh University, 27 Memorial Drive West, Bethlehem, PA. Their son is scheduled for surgery on Wednesday September 29, 2021, after having sustained a season-ending injury. The estimated travel time from Mr. Green's residence to the school is approximately 1.5 hours. Mr. Green was first notified of the matter on Tuesday, September 21, 2021.

This Court granted Mr. Green the following bail package:

1. \$100,000 PRB, 2. Co-signed by three (3) Financially responsible persons, 3. Secured by his wife's Manhattan coop, 4. Surrender of all passports and no new applications, 5. Travel restricted to the SDNY and the EDNY, 6. Pre-Trial Supervision, 7. Defendant must maintain employment.

Mr. Green met the bail conditions before his release and was released from the Metropolitan Correctional Center (MCC) on July 15, 2019. To date, Mr. Green has complied with this Court's bail conditions.

Mr. Green and his wife are anxious to comfort their son. This reasonable modification should allow the Green family an opportunity to reaffirm their familial relations, which have been tested by the facts and circumstances of the matter before the Court. I have the consent of the Government and Pretrial Services for this request.

USDC SDNY	DOCUMENT	ELECTRONICALLY FILED
DOC #:	100-13036	DATE FILED: 10/29/21

Granted
Colleen McMahon
9/30/2021

Please contact me if you have any questions or concerns.

Sincerely,

s/D. Andrew Marshall
D. Andrew Marshall, Esq.

cc: Timothy Capozzi, Assistant United States Attorney (via electronic mail)
Aline Flodr, Assistant United States Attorney (via electronic mail)
Erin Cunningham, Pretrial Services (via electronic mail)
Marlon G. Kirton, Esq. (via electronic mail)